

Exhibit 24

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

VALERIE JO DALIS and NICHOLAS J.)

DALIS,)

Plaintiffs,)

) Case No. MID L-4821-15AS

vs.)

BRENNTAG NORTH AMERICA, INC.,)

ET AL.,)

Defendants.)

_____)

DEPOSITION OF NICHOLAS DALIS

Date and Time: Tuesday, December 22, 2015
10:01 a.m.

Location: 301 South Market Street
San Jose, CA 95113

Reported by: Cammi R. Bowen, CSR-13492

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| <p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2 For the Plaintiff: SIMON GREENSTONE PANATIER BARTLETT</p> <p>3 3780 Kilroy Airport Way</p> <p>4 Suite 540</p> <p>5 Long Beach, California 90806</p> <p>6 Tel: (562) 590-3400</p> <p>7 E-mail: Lkagan@sgplaw.com</p> <p>8 BY: LEAH C. KAGAN, ESQ.</p> <p>9 For the Defendants QUINN EMANUEL URQUHART & SULLIVAN LLP</p> <p>10 Colgate-Palmolive: 50 California Street</p> <p>11 22nd Floor</p> <p>12 San Francisco, California 94111</p> <p>13 Tel: (415) 875-6421</p> <p>14 E-mail: Meredithshaw@quinnemanuel.com</p> <p>15 BY: MEREDITH M. SHAW, ESQ.</p> <p>16 For the Defendants HOAGLAND LONGO MORAN, DUNST & DOUKAS, LLP</p> <p>17 Whittaker, Clark & 40 Paterson Street</p> <p>18 Daniels, Cyprus P.O. Box 480</p> <p>19 Amax Minerals New Brunswick, New Jersey 08903</p> <p>20 Company: Tel: (732) 545-4717</p> <p>21 E-Mail: Mgaffrey@hoaglandlongo.com</p> <p>22 BY: MARC S. GAFFREY, ESQ.</p> <p>23 For the Defendant CONNELL FOLEY LLP</p> <p>24 Conair: 85 Livingston Avenue</p> <p>25 Roseland, New Jersey 07068</p> <p>Tel: (973) 535-0500</p> <p>E-mail: Spress@connellfoley.com</p> <p>BY: SCOTT M. PRESS, ESQ.</p> <p>(Telephonically)</p> <p>Also Present: Cassia Leet, Videographer</p> | <p style="text-align: right;">Page 4</p> <p>1 WITNESS INSTRUCTED NOT TO ANSWER</p> <p>2 PAGE LINE</p> <p>3 16 7</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |
| <p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 EXAMINATIONS: PAGE</p> <p>3 By Ms. Shaw..... 14</p> <p>4 By Mr. Gaffrey..... 189</p> <p>5 By Ms. Shaw..... 242</p> <p>6 By Ms. Kagan..... 245</p> <p>7</p> <p>8 EXHIBITS</p> <p>9 Dfs. Exhibit</p> <p>10 No. Description Ident.</p> <p>11 Exhibit 1 Notice of Deposition..... 146</p> <p>12 Exhibit 2 United States Bankruptcy Court</p> <p>13 Voluntary Petition..... 159</p> <p>14 Exhibit 3 United States Bankruptcy Court</p> <p>15 Summary of Schedules..... 160</p> <p>16 Exhibit 4 United States Bankruptcy Court</p> <p>17 Voluntary Petition..... 173</p> <p>18 Exhibit 5 Special Criminal Hearing</p> <p>19 information document dated</p> <p>20 1/22/93..... 178</p> <p>21 Exhibit 6 "Information" in the People of</p> <p>22 the State of California vs.</p> <p>23 Garden City, Inc., et al case..... 179</p> <p>24 Exhibit 7 Abstract of Judgment - Prison</p> <p>25 Commitment for Defendant Nicholas</p> <p>John Dalis..... 179</p> <p>Exhibit 8 Document titled "Hit #5 - The</p> <p>Plaintiff was involved in large</p> <p>criminal case. Partial summary</p> <p>is below"..... 195</p> | <p style="text-align: right;">Page 5</p> <p>1 MR. GAFFREY: This is Marc Gaffrey. I</p> <p>2 represent Whittaker, Clark & Daniels, and Cyprus</p> <p>3 Amax in this case.</p> <p>4 I learned within the last couple of days</p> <p>5 that Mr. Dalis, who is to be deposed today and who</p> <p>6 is a party to this lawsuit, filed for bankruptcy,</p> <p>7 and I understand it to be in September of 2015,</p> <p>8 although I'm not certain of the date.</p> <p>9 My concern is issues related to bankruptcy.</p> <p>10 There is an issue in this case as to choice of law.</p> <p>11 I will admit, I don't know anything about bankruptcy</p> <p>12 law. I've been involved in many cases over the</p> <p>13 years that have had bankruptcy issues. I have</p> <p>14 deferred to others much wiser than me with respect</p> <p>15 to those issues.</p> <p>16 I don't know and I sought advice last</p> <p>17 evening with respect to -- since Mr. Dalis is a</p> <p>18 party to this lawsuit and since his testimony could</p> <p>19 have an impact, positive or negative, on the value</p> <p>20 of this case, is it ethically appropriate to proceed</p> <p>21 with this deposition today? And, simply, I ask</p> <p>22 because I don't know. And I asked a number of</p> <p>23 attorneys, both California attorneys as well as New</p> <p>24 Jersey attorneys, and the answer was a resounding,</p> <p>25 "We don't know."</p> |

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| <p style="text-align: right;">Page 138</p> <p>1 that she had to have it removed. I think there was</p> <p>2 a cyst and that's why they removed it.</p> <p>3 Whether it was cancerous or not, I don't</p> <p>4 believe so.</p> <p>5 Q. Do you recall what Mrs. Dalis told you</p> <p>6 about having her ovary removed when you were in</p> <p>7 daily contact with her during this time?</p> <p>8 A. I remember discussing it and -- and</p> <p>9 sympathizing with her, but that's about it.</p> <p>10 Q. Did your wife also have surgery for a</p> <p>11 hernia at some point?</p> <p>12 A. Yes.</p> <p>13 Q. And was that in about 2000?</p> <p>14 A. I believe so.</p> <p>15 Q. And do you know anything about Mrs. Dalis's</p> <p>16 hernia operation in about 2000?</p> <p>17 A. Other than the fact that she had it and</p> <p>18 that's -- that's all I know.</p> <p>19 Q. I've seen a reference in Mrs. Dalis's</p> <p>20 medical records to the surgery involving mesh,</p> <p>21 m-e-s-h.</p> <p>22 Does that ring any bells for you?</p> <p>23 A. Sure.</p> <p>24 Q. Okay. And what do you know about mesh</p> <p>25 being used in Mrs. Dalis's hernia operation?</p> | <p style="text-align: right;">Page 140</p> <p>1 BY MS. SHAW:</p> <p>2 Q. Okay. So there was a surgery to remove</p> <p>3 the -- the -- her right ovary; right?</p> <p>4 A. Yes.</p> <p>5 Q. There was a surgery for the hernia?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And a cataract surgery?</p> <p>8 A. Yes.</p> <p>9 Q. Any other surgery that you recall</p> <p>10 Mrs. Dalis having?</p> <p>11 A. Other than the surgery that she had</p> <p>12 regarding this, no, I can't.</p> <p>13 Q. Okay. While you've been married to</p> <p>14 Mrs. Dalis, do you recall her having any other</p> <p>15 significant medical issues other than your common</p> <p>16 cold or flu up until the time of her current</p> <p>17 illness?</p> <p>18 A. No.</p> <p>19 Q. Is anyone financially dependent on you?</p> <p>20 A. Not anymore.</p> <p>21 Q. When you say "not anymore," what do you</p> <p>22 mean?</p> <p>23 A. Well, I -- I -- I took care of my mother</p> <p>24 and my mother-in-law when they were in assisted</p> <p>25 living. And our sons became self --</p> |
| <p style="text-align: right;">Page 139</p> <p>1 A. Well, I've had a couple of hernia</p> <p>2 operations myself.</p> <p>3 Q. Okay.</p> <p>4 A. And the first time, they tried to repair it</p> <p>5 with mesh. And I was lifting weights at the time,</p> <p>6 and I just ripped it up. So they went in and had to</p> <p>7 correct it through surgery.</p> <p>8 So the mesh is put on underneath the --</p> <p>9 and -- and stretched over the hernia so that the</p> <p>10 hernia can't protrude anymore. And I believe the --</p> <p>11 her first surgery was the mesh-type surgery for the</p> <p>12 hernia.</p> <p>13 Q. When you say Mrs. Dalis's "first surgery,"</p> <p>14 was there a second surgery?</p> <p>15 A. I don't think so. I'm not sure.</p> <p>16 Q. Other than the two surgeries we've just</p> <p>17 talked about, while you've been married to</p> <p>18 Mrs. Dalis, do you recall any -- any surgeries?</p> <p>19 A. She -- cataract surgery.</p> <p>20 Q. Okay. And I'm excluding from that anything</p> <p>21 related to her current illness.</p> <p>22 A. Oh, yes. She --</p> <p>23 MS. KAGAN: Ex- -- excluding.</p> <p>24 THE WITNESS: Oh, okay. Right.</p> <p>25 ///</p> | <p style="text-align: right;">Page 141</p> <p>1 self-sufficient. So there's really nobody else</p> <p>2 that's dependent upon me.</p> <p>3 Q. And when -- since you've been married to</p> <p>4 Mrs. Dalis, you've financially supported Mrs. Dalis?</p> <p>5 A. Yes.</p> <p>6 Q. Since Mrs. Dalis has been diagnosed with</p> <p>7 her current illness in 2014, have you hired anyone</p> <p>8 to perform work around the house?</p> <p>9 A. Yes.</p> <p>10 Q. Who have you hired?</p> <p>11 A. We have -- we have a -- one gentleman that</p> <p>12 comes in once a month and cleans everything</p> <p>13 thoroughly. And I do -- I do all the house</p> <p>14 cleaning.</p> <p>15 Q. And when did you first hire the gentleman</p> <p>16 to do the house cleaning?</p> <p>17 A. Well, he was originally hired by my mother</p> <p>18 when my mother was living in the -- in the home, and</p> <p>19 we -- we kept him on.</p> <p>20 Q. Okay. So when your mother passed in</p> <p>21 2008 --</p> <p>22 A. Yes.</p> <p>23 Q. -- you continued to employ a gent- -- the</p> <p>24 gentleman to clean your house about once a month?</p> <p>25 A. The heavy work, yes.</p> |

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| <p style="text-align: right;">Page 142</p> <p>1 Q. I'm sorry?</p> <p>2 A. The heavy work in the house.</p> <p>3 Q. And --</p> <p>4 MS. KAGAN: Nick, this is an example where</p> <p>5 Meredith asked you about hiring somebody after</p> <p>6 Valerie got sick.</p> <p>7 THE WITNESS: Oh. Okay. I'm sorry.</p> <p>8 We haven't hired anyone since Valerie has</p> <p>9 been sick.</p> <p>10 MS. KAGAN: If there's a time that you</p> <p>11 don't understand Meredith's question --</p> <p>12 THE WITNESS: Right. Okay.</p> <p>13 MS. KAGAN: -- you can tell her and she'll</p> <p>14 rephrase it or ask it again.</p> <p>15 THE WITNESS: All right. Okay.</p> <p>16 BY MS. SHAW:</p> <p>17 Q. Have you and Mrs. Dalis received any</p> <p>18 payments in connection with Mrs. Dalis's illness?</p> <p>19 A. Yes.</p> <p>20 Q. What payment have you received in</p> <p>21 connection with Mrs. Dalis's illness?</p> <p>22 A. The first legal group that we retained for</p> <p>23 the mesothelioma advised us to accept a check</p> <p>24 from -- I believe it was Johns Mansville [sic] -- it</p> <p>25 was for \$21,000 and change -- advising us that they</p> | <p style="text-align: right;">Page 144</p> <p>1 THE WITNESS: Okay. All right.</p> <p>2 MS. KAGAN: -- the attorneys here in the</p> <p>3 room.</p> <p>4 (The court reporter addressed</p> <p>5 simultaneous speaking.)</p> <p>6 THE WITNESS: All right. I understand.</p> <p>7 BY MS. SHAW:</p> <p>8 Q. I'll ask the question again for you.</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. Your -- the first attorney that you</p> <p>11 retained after your wife became ill filed a claim on</p> <p>12 behalf of you and Mrs. Dalis with the Johns Manville</p> <p>13 trust for Mrs. Dalis's illness; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And the Johns Manville trust paid</p> <p>16 you and Mrs. Dalis approximately \$21,000 for</p> <p>17 Mrs. Dalis's illness?</p> <p>18 A. Yes.</p> <p>19 Q. Did you and Mrs. Dalis complete any</p> <p>20 paperwork in connection with your claim to the Johns</p> <p>21 Manville trust?</p> <p>22 A. I don't recall.</p> <p>23 Q. Did you provide any information to the</p> <p>24 Johns Manville trust about Mrs. Dalis?</p> <p>25 A. I don't recall.</p> |
| <p style="text-align: right;">Page 143</p> <p>1 have this money set aside and we should go ahead and</p> <p>2 take it.</p> <p>3 Q. Okay. So did you and Mrs. Dalis file a</p> <p>4 claim with Johns Manville bankruptcy trust for</p> <p>5 Mrs. Dalis's illness?</p> <p>6 A. The -- the mesothelioma original attorney</p> <p>7 did.</p> <p>8 Q. So your attorney filed a claim with the</p> <p>9 Johns Manville trust --</p> <p>10 A. Yes.</p> <p>11 Q. -- on behalf of you and Mr. -- excuse me,</p> <p>12 you and Mrs. Dalis for causing Mrs. Dalis's illness;</p> <p>13 is that right?</p> <p>14 MS. KAGAN: Objection. Lacks foundation,</p> <p>15 calls for a legal conclusion, lacks personal</p> <p>16 knowledge, calls for speculation.</p> <p>17 THE WITNESS: They told us they were going</p> <p>18 to --</p> <p>19 MS. KAGAN: Nick, I'm going to object to</p> <p>20 privilege here. What they told you --</p> <p>21 THE WITNESS: Attorney-client privilege.</p> <p>22 MS. KAGAN: -- is privileged. You --</p> <p>23 THE WITNESS: Yeah.</p> <p>24 MS. KAGAN: -- you don't get to share that</p> <p>25 with --</p> | <p style="text-align: right;">Page 145</p> <p>1 Q. Do you know if Mrs. Dalis was exposed to</p> <p>2 asbestos as a result of a product made or sold by</p> <p>3 Johns Manville?</p> <p>4 MS. KAGAN: Objection. Lacks foundation,</p> <p>5 lacks personal knowledge, calls for speculation.</p> <p>6 MR. GAFFREY: And I'm going to object to</p> <p>7 form for the use "exposed."</p> <p>8 BY MS. SHAW:</p> <p>9 Q. Do you know if Mrs. Dalis -- do you know if</p> <p>10 Mrs. Dalis used any product made or sold by Johns</p> <p>11 Manville?</p> <p>12 A. No, I don't know.</p> <p>13 Q. Do you -- what do you know about Johns</p> <p>14 Manville, if anything?</p> <p>15 A. I know they -- they built -- what? --</p> <p>16 large, like storm drains. That's about all I know.</p> <p>17 Q. What was your basis for making a claim to</p> <p>18 the Johns Manville trust for Mrs. Dalis's illness?</p> <p>19 MS. KAGAN: Objection. Lacks foundation,</p> <p>20 lacks personal knowledge, calls for a legal</p> <p>21 conclusion.</p> <p>22 THE WITNESS: Advice by the attorney.</p> <p>23 BY MS. SHAW:</p> <p>24 Q. Do you have any knowledge of any connection</p> <p>25 between your wife and a product made or sold by</p> |

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| <p style="text-align: right;">Page 146</p> <p>1 Johns Manville?</p> <p>2 A. No.</p> <p>3 Q. And you and your wife accepted compensation</p> <p>4 from Johns Manville for your wife's illness; is that</p> <p>5 right?</p> <p>6 MS. KAGAN: Asked and answered.</p> <p>7 THE WITNESS: Yes. Upon counsel's advice.</p> <p>8 MS. SHAW: I'd like to mark an exhibit.</p> <p>9 (Defendants' Exhibit 1, Notice of</p> <p>10 Deposition, was marked for</p> <p>11 identification.)</p> <p>12 MS. SHAW: For the record, we're going to</p> <p>13 mark as Exhibit 1 the notice of deposition for</p> <p>14 Mr. Nicholas Dalis's deposition here today.</p> <p>15 BY MS. SHAW:</p> <p>16 Q. Sir, take a moment and take a look through</p> <p>17 that.</p> <p>18 Do you recognize this document, Exhibit 1?</p> <p>19 A. Do I recognize it? No, no.</p> <p>20 Q. So you see Schedule A to the notice of</p> <p>21 deposition, Exhibit 1, has a list of "Documents and</p> <p>22 Other Tangible Things to Be Produced"?</p> <p>23 A. No.</p> <p>24 Q. Have you made any effort to search for or</p> <p>25 determine if you have any of the documents listed in</p> | <p style="text-align: right;">Page 148</p> <p>1 and answered. He's already testified that the only</p> <p>2 things that he viewed were family photos. And I've</p> <p>3 already represented to counsel that in this room,</p> <p>4 there's a bag of family photos that will be scanned</p> <p>5 and produced to counsel, which was produced to me on</p> <p>6 Sunday prior to this deposition.</p> <p>7 MS. SHAW: Counsel, again, if you could</p> <p>8 refrain from the speaking objection, I would</p> <p>9 appreciate it.</p> <p>10 MS. KAGAN: If you can refrain from</p> <p>11 harassing and duplicative questions, I, too, would</p> <p>12 appreciate it.</p> <p>13 BY MS. SHAW:</p> <p>14 Q. Sir, do you have my question in mind?</p> <p>15 A. No.</p> <p>16 Q. Okay. Do you have in your possession any</p> <p>17 documents that you viewed, looked at, or were shown</p> <p>18 or which were read to you by any person at any time</p> <p>19 in preparation for this deposition?</p> <p>20 A. In my possession?</p> <p>21 Q. Correct.</p> <p>22 A. No.</p> <p>23 Q. Do you have any documents that relate to</p> <p>24 plaintiff Valerie Jo Dalis's application or use of</p> <p>25 any cosmetic talcum powder product?</p> |
| <p style="text-align: right;">Page 147</p> <p>1 Schedule A numbered under the heading of "Documents</p> <p>2 and Other Tangible Things to Be Produced"?</p> <p>3 MS. KAGAN: I'm going to object and note</p> <p>4 for the record that counsel on behalf of Mr. Dalis</p> <p>5 has responded to this notice and provided responses</p> <p>6 to each of the 23 requests and objections thereto.</p> <p>7 THE WITNESS: And your question is?</p> <p>8 BY MS. SHAW:</p> <p>9 Q. Have you made an effort to search for or</p> <p>10 determine if you have any of the documents and other</p> <p>11 tangible things to be produced listed on Schedule A</p> <p>12 to Exhibit 1?</p> <p>13 MS. KAGAN: Same objection, incorporating</p> <p>14 the objections provided to counsel in response to</p> <p>15 this notice.</p> <p>16 THE WITNESS: I -- I -- I have no idea.</p> <p>17 BY MS. SHAW:</p> <p>18 Q. Let's go through -- go through this, then,</p> <p>19 and see if you believe you might have any of the</p> <p>20 documents that are listed on Schedule A; okay?</p> <p>21 Do you have in your possession any</p> <p>22 documents that you viewed, looked at, or were shown</p> <p>23 or were -- which were read to you at any time in</p> <p>24 preparation for your deposition?</p> <p>25 MS. KAGAN: I'm going to object to asked</p> | <p style="text-align: right;">Page 149</p> <p>1 MS. KAGAN: Same objections, incorporating</p> <p>2 the objections that were previously provided to</p> <p>3 counsel with respect to Request Number 2.</p> <p>4 THE WITNESS: No.</p> <p>5 BY MS. SHAW:</p> <p>6 Q. Okay. Do you have any documents that</p> <p>7 depict, describe, or relate to any cosmetic talcum</p> <p>8 powder product identified in response to Request</p> <p>9 Number 2?</p> <p>10 So we can skip that one.</p> <p>11 Do you have any documents that relate to</p> <p>12 plaintiff Valerie Jo Dalis's exposure to asbestos</p> <p>13 from any source including from construction or</p> <p>14 remodeling at any of her residences, from asbestos</p> <p>15 on the clothes of any person, and from</p> <p>16 environmental, community, or ambient asbestos?</p> <p>17 MS. KAGAN: Same objection, incorporating</p> <p>18 the objections previously provided to counsel.</p> <p>19 MR. GAFFREY: On behalf of my two clients,</p> <p>20 I'm offering Leah a continuing objection along those</p> <p>21 lines so that we can complete this deposition today.</p> <p>22 MS. KAGAN: I don't accept. I'm entitled</p> <p>23 to object to each of those questions, but thank you</p> <p>24 for your offer.</p> <p>25 MR. GAFFREY: You -- you are entitled to</p> |

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| <p style="text-align: right;">Page 246</p> <p>1 MS. SHAW: Join.</p> <p>2 THE WITNESS: To the contrary.</p> <p>3 We have gone through a number of disastrous</p> <p>4 situations that would probably break up -- any one</p> <p>5 of which would have broken up other couples. We</p> <p>6 lost my business, we lost my freedom, we lost a</p> <p>7 couple of homes.</p> <p>8 And it's -- we would never have made it</p> <p>9 this far unless we really loved each other. And</p> <p>10 she's been the most nurturing wife I could ever --</p> <p>11 ever want; a great mother and a great homemaker.</p> <p>12 And a great grandmother, by the way.</p> <p>13 But to the contrary. She's been -- she's</p> <p>14 provided me with -- and she stood by me when I was</p> <p>15 a -- away for almost two years and took care of our</p> <p>16 stepson as if he were her own son.</p> <p>17 And to answer your question, no, she's --</p> <p>18 our relationship is stronger than ever, because -- I</p> <p>19 just -- unfortunately, we're just not going to be</p> <p>20 able to get through this final episode, but we're</p> <p>21 going to try to make it as comfortable as we can for</p> <p>22 her.</p> <p>23 MS. KAGAN: Those are all the questions</p> <p>24 that I have.</p> <p>25 MS. SHAW: Marc.</p> | <p style="text-align: right;">Page 248</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3 I, CAMMI R. BOWEN, a Certified Shorthand</p> <p>4 Reporter, hereby certify that the witness in the foregoing</p> <p>5 deposition was by me duly sworn to tell the truth, the</p> <p>6 whole truth, and nothing but the truth in the</p> <p>7 within-entitled cause;</p> <p>8 That said deposition was taken down in shorthand</p> <p>9 by me, a disinterested person, at the time and place</p> <p>10 therein stated, and that the testimony of the said witness</p> <p>11 was thereafter reduced to typewriting, by computer, under</p> <p>12 my direction and supervision;</p> <p>13 Further, that if the foregoing pertains to the</p> <p>14 original transcript of a deposition in a Federal Case,</p> <p>15 before completion of the proceedings, review of the</p> <p>16 transcript [] was [] was not requested.</p> <p>17 I further certify that I am not of counsel or</p> <p>18 attorney for either or any of the parties to the said</p> <p>19 deposition, nor in any way interested in the events of</p> <p>20 this cause, and that I am not related to any of the</p> <p>21 parties hereto.</p> <p>22 DATED: 1/4/2016</p> <p>23</p> <p>24 CAMMI R. BOWEN</p> <p>25 CSR #13492</p> |
| <p style="text-align: right;">Page 247</p> <p>1 MR. GAFFREY: I'm done.</p> <p>2 MS. SHAW: I think we're finished for</p> <p>3 today. Thank you very much, sir.</p> <p>4 THE WITNESS: Thank you.</p> <p>5 MS. KAGAN: This concludes the discovery</p> <p>6 deposition of Nicholas Dalis.</p> <p>7 THE VIDEOGRAPHER: Okay. The number of</p> <p>8 media used was four and will be retained by Veritext</p> <p>9 Legal Solutions. The time is 5:15 p.m. We're off</p> <p>10 the record.</p> <p>11 (Off the record.)</p> <p>12 (Whereupon, the deposition of Nicholas</p> <p>13 Dalis was concluded at 5:15 p.m.)</p> <p>14 --oOo--</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> | |